

**.0IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
OSCAR MONEGRO,	:	VIOLATIONS:
a/k/a "Jose Figueroa,"	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Javier Rivera,"	:	and possess with intent to distribute one
FRANKLYN SANCHEZ	:	kilogram or more of heroin - 1 count)
WILSON RONDON	:	21 U.S.C. § 841(a)(1) (distribution of
	:	heroin - 12 counts)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute heroin - 1 count)
	:	8 U.S.C. § 1326(a), (b)(2) (illegal reentry
	:	after deportation - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least in or about December 2005, through in or about April 2007, in Philadelphia, in the Eastern District of Pennsylvania, the Eastern District of New York, and elsewhere, defendants

**OSCAR MONEGRO,
a/k/a "Jose Figueroa,"
a/k/a "Javier Rivera," and
FRANKLYN SANCHEZ**

conspired and agreed, together and with Ramon Nasario, a/k/a "Moreno," Luis Miguel Batance Marrero, a/k/a "Luis Miguel," Hipolito Alberto Sanchez Grullon, and Francis Alberto Gonzalez, a/k/a "Flaco," charged elsewhere, and others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with the intent to distribute one kilogram or

more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant OSCAR MONEGRO and Ramon Nasario (hereinafter “Moreno”) negotiated with Luis Miguel Betance Marrero (hereinafter “Luis Miguel”) and other individuals known to the grand jury about the importation of heroin from the Dominican Republic to the United States.

3. Defendant OSCAR MONEGRO and Moreno met with and obtained heroin from Luis Miguel, Hipolito Alberto Sanchez Grullon and others, who ingested packets containing heroin and traveled from the Dominican Republic to the United States.

4. Defendant OSCAR MONEGRO and Moreno transported heroin from New York, New York to Philadelphia, Pennsylvania.

5. Defendants OSCAR MONEGRO and FRANKLYN SANCHEZ, and others known and unknown to the grand jury, distributed heroin in and around Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 2, 2005, defendant OSCAR MONEGRO supplied Rhamades Robles, charged elsewhere, with approximately 240 grams of heroin.
2. On or about January 26, 2006, defendant OSCAR MONEGRO distributed approximately 1.4 grams of heroin to an undercover police officer ("UC").
3. On or about February 3, 2006, defendant OSCAR MONEGRO distributed approximately 1.6 grams of heroin to UC.
4. On or about March 28, 2006, defendant OSCAR MONEGRO distributed approximately 10.9 grams of heroin to E.F.
5. On or about April 6, 2006, defendant OSCAR MONEGRO distributed approximately 10.9 grams of heroin to E.F.
6. On or about May 11, 2006, defendant OSCAR MONEGRO distributed approximately 33.2 grams of heroin to E.F.
7. On or about June 6, 2006, defendant OSCAR MONEGRO distributed approximately 11 grams of heroin to E.F.
8. On or about July 18, 2006, defendant OSCAR MONEGRO distributed approximately 29.4 grams of heroin to E.F.

9. On or about July 24, 2006, defendant OSCAR MONEGRO engaged in a telephone conversation with E.F. regarding the price of heroin, referred to in the conversation by the code word, “fingers.”

10. On or about August 18, 2006, defendant OSCAR MONEGRO distributed approximately 21.6 grams of heroin to E.F.

11. On or about September 15, 2006, defendant OSCAR MONEGRO engaged in a telephone conversation with E.F. and discussed defendant MONEGRO’s prices for bulk heroin (\$70 to \$75 per gram), bundles of heroin (18 packets per bundle for \$65), and cocaine (\$20,000 per kilogram).

12. On or about November 13, 2006, defendant OSCAR MONEGRO met UC at G Street and Hunting Park Avenue. Defendant MONEGRO through an intermediary, distributed 31.6 grams of heroin to UC.

13. On or about November 30, 2006, defendant OSCAR MONEGRO engaged in a telephone conversation with Moreno. Moreno asked defendant MONEGRO what he had done. Defendant MONEGRO said that he had gotten rid of what was left and wanted to know if the “stuff” would be coming the following day so he could let his customers know their status and when they could expect to receive them.

14. On or about December 3, 2006, defendant OSCAR MONEGRO engaged in a drug-related telephone conversation with unindicted coconspirator #1 believed to be located in the Dominican Republic, in which defendant MONEGRO inquired about a drug shipment.

15. On or about December 13, 2006, defendant OSCAR MONEGRO engaged in a telephone conversation with Luis Miguel, believed to be located in the Dominican Republic

at the time. Miguel discussed his desire to obtain money, including commissions, that defendant MONEGRO and Moreno owed to him.

On or about December 14, 2006:

16. Defendant OSCAR MONEGRO engaged in a telephone conversation with Luis Miguel, during which Miguel informed defendant MONEGRO that he had spoken with unindicted coconspirator #1 regarding two individuals who would be the next drug couriers.

17. Defendant OSCAR MONEGRO subsequently engaged in a telephone conversation with unindicted coconspirator #2, who wanted defendant MONEGRO to bring him 250 “pesos” in “good condition.”

18. Defendant OSCAR MONEGRO engaged in a telephone conversation with a person known to the grand jury regarding a heroin transaction. Afterwards, defendant MONEGRO met this person and sold him a total of 25 packets of heroin, weighing approximately one gram.

19. On or about December 16, 2006, defendant OSCAR MONEGRO received a telephone call from unindicted coconspirator #2, who wanted defendant MONEGRO to bring him “100 pesos” and said that the “100 pesos” were for the same people as yesterday.

On or about December 19, 2006:

20. Defendant OSCAR MONEGRO engaged in a telephone call with UC in which UC stated that he wanted “20 pesos.” Later in their conversation, UC stated that he wanted two of ten and, later, “two fingers” of heroin at ten grams each. Defendant MONEGRO stated that he could do that.

21. Following the conversation with UC referenced in paragraph 20, defendant OSCAR MONEGRO contacted unindicted coconspirator #2 and asked him if he could have “20 pesos from the “stuff” defendant MONEGRO gave to unindicted coconspirator #2. Unindicted coconspirator #2 said that he only had “30 pesos” remaining from the “stuff” he had gotten from defendant MONEGRO.

22. Following the telephone conversation referenced in paragraph 21, defendant OSCAR MONEGRO met with UC and handed him approximately 20 grams of heroin in exchange for the sum of \$1,200.

23. On or about December 22, 2006, defendant OSCAR MONEGRO engaged in a telephone conversation with Moreno and discussed drug prices and drug debts.

24. On or about January 26, 2007, Luis Miguel and Hipolito Alberto Sanchez Grullon, while entering into the United States at John F. Kennedy Airport in Queens, New York on a flight that originated in the Dominican Republic, were in possession of 60 pellets, totaling one kilogram, of heroin in their body cavities.

25. On or about February 5, 2007, defendant OSCAR MONEGRO engaged in a telephone conversation with unindicted coconspirator #1 in which unindicted coconspirator #1 told defendant MONEGRO to see “the Barber” to pick up “200 pesos.”

26. On or about February 6, 2007, defendant OSCAR MONEGRO engaged in a telephone conversation with unindicted coconspirator #1, who asked defendant MONEGRO if he had received the “200 pesos” from “the Barber.” Unindicted coconspirator #1 told defendant MONEGRO to do whatever he wanted with the “200 pesos,” but also reminded defendant MONEGRO that he owed a debt to Moreno.

On or about February 8, 2007:

27. Defendant OSCAR MONEGRO engaged in a telephone conversation with defendant Wilson RONDON, charged in Count 15, and defendant MONEGRO asked codefendant RONDON if he wanted “100 pesos.” Defendant RONDON replied that he wanted the “pesos” and asked defendant MONEGRO to bring them to him.

30. Defendant OSCAR MONEGRO subsequently met codefendant Wilson RONDON at Rising Sun and Ashdale Avenues in Philadelphia, Pennsylvania and distributed heroin to Rondon.

On or about March 14, 2007:

31. Defendant OSCAR MONEGRO engaged in two telephone conversations with a person known to the grand jury during, during which defendant MONEGRO asked if he had finished selling the bundles of heroin that defendant MONEGRO had given him on a previous occasion and this person indicated that he had finished it and wanted “four” more.

32. After talking to the person referenced in paragraph 31, defendant OSCAR MONEGRO engaged in a telephone conversation with defendant Franklyn SANCHEZ and told codefendant SANCHEZ to take that person “five.” Codefendant SANCHEZ told defendant MONEGRO to tell that person that defendant MONEGRO was sending him, and defendant MONEGRO said that he had already told that person.

33. On or about March 19, 2007, defendant OSCAR MONEGRO engaged in a telephone conversation with Francis Alberto Molina, a/k/a “Flaco” (hereinafter “Flaco”), who told defendant MONEGRO that he had wired \$1,050 in advance to the Dominican Republic to pay for future shipments of heroin.

34. On or about March 23, 2007, defendant OSCAR MONEGRO engaged in a telephone conversation with Flaco, during which defendant MONEGRO inquired as to how many “cars” were coming from “the dealer.” Defendant MONEGRO stated that he had already sold two.

On or about March 29, 2007:

35. Defendant OSCAR MONEGRO engaged in a telephone conversation with Moreno, during which defendant MONEGRO asked if Moreno was going to bring him the

“things.” Defendant MONEGRO told Moreno that he had the money and that he should bring “five pesos.”

36. Later the same day, Moreno traveled from New York to Philadelphia in defendant OSCAR MONEGRO’s vehicle, in which approximately 500 grams of heroin was hidden inside a secret compartment.

37. On or about April 6, 2007, defendant OSCAR MONEGRO and Moreno’s drug courier, Jose Ariel Gil, charged elsewhere, arrived at John F. Kennedy Airport in Queens, New York, aboard a flight from the Dominican Republic in possession of a total of 93 pellets weighing a total of 1,242 grams of heroin.

On or about April 10, 2007:

38. Defendant OSCAR MONEGRO engaged in a telephone conversation with defendant FRANKLYN SANCHEZ. During the telephone conversation, defendant SANCHEZ requested 700 grams of heroin and asked defendant MONEGRO to contact his cousin in New York to get it. Defendant SANCHEZ stated that he had the money for it.

39. Defendant OSCAR MONEGRO engaged in a telephone conversation with Moreno. Defendant MONEGRO stated that he wanted 700 grams of heroin. Moreno told defendant MONEGRO that he could only give him 500 grams of heroin.

40. From on or about April 10, 2007 to on or about April 11, 2007, defendant MONEGRO traveled from Philadelphia, PA to the area of 238th and Bailey Streets in New York and, in the early morning hours of April 11, 2007, met with Moreno.

42. On or about April 11, 2007, defendant OSCAR MONEGRO possessed approximately 500 grams of heroin that was hidden in a compartment underneath the floor of defendant MONEGRO's vehicle.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 3, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 18, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount
of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,”**

knowingly and intentionally distributed 100 grams or more of a mixture and substance containing
a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 8, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

WILSON RONDON,

knowingly and intentionally possessed with intent to distribute 100 grams or more of a mixture
and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant

FRANKLYN SANCHEZ,

an alien who had previously been deported from the United States on or about January 24, 1996, was found in the United States, having knowingly and unlawfully re-entered and attempted to re-enter the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

NOTICE OF CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Section 846 and 841(a)(1), set forth in this indictment, defendants

**OSCAR MONEGRO,
a/k/a “Jose Figueroa,”
a/k/a “Javier Rivera,” and
FRANKLYN SANCHEZ,**

shall forfeit to the United States:

(a) Any property constituting, or derived from, proceeds obtained as the result of such violations; and

(b) Any property used, or intended to be used, to commit, or to facilitate the commission of such violations, including, but not limited to the following:

(1) Approximately \$30,020 seized from the residence of defendant FRANKLYN SANCHEZ on April 11, 2007, and any other monies received as a result of the distribution of heroin.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney